

HOFLAND & TOMSHECK
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Attorney for Defendant Teran

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Case No. 2:23-cr-00179-RFB-NJK

Plaintiff,

vs.

DONALD RAY RUCKER,
LORENZO ANTONIO TERAN,
and
NANCY TERAN

Defendant.

**UNOPPOSED MOTION TO CONTINUE NANCY TERAN'S SENTENCING
PROCEEDING**

1 **POINTS AND AUTHORITIES**

2 On February 5, 2024, Nancy Teran pleaded guilty pursuant to a written plea
3 agreement to two conspiracy counts involving robbery and carjacking. (*See* ECF No. 50 (COP
4 minutes); 51 (plea agreement).) The plea agreement resolves most sentencing issues. The
5 parties have agreed upon the final adjusted Sentencing Guideline Manual offense level and
6 bars either party from seeking a departure or variance. (*See* Plea Agreement at ¶¶ 14-17.)

7 As explained in the Presentence Investigation Report (PSR), the agreed upon
8 components translate into a final Guideline range of 70-87 months. (PSR §§ 63, 106.)
9 Probation recommends a seventy-month sentence. (*See id.* at p.27 (Sentencing
10 Recommendation).)

11 This leads to a relatively uncomplicated sentencing proceeding. Yet, because of press
12 of business and other factors, defendant Nancy Teran respectfully requests the sentencing
13 proceeding be continued for at least two weeks.

14 That this week both myself and my associate have been focused on a major publishing
15 project that has a firm deadline. The myopic focus on this due date prevented finalizing the
16 preparation for Ms. Teran's sentencing proceeding.

17 While there are no real contested issues to address during the sentencing, the defense
18 would appreciate further time to ensure that Ms. Teran is prepared for the sentencing and
19 that all needed materials have been acquired and prepared. This is the defense's first request
20 for a continuance.

21 On April 26, 2024, counsel contacted Assistant United States Attorney David Kiebler
22 and informed him of this request. The government, graciously, does not object to continuing
23 Ms. Teran's sentencing proceeding.
24

1 For these reasons, the defense respectfully requests this Court continue Ms. Teran's
2 sentencing proceeding for not less than two weeks.

3 DATED this 26th day of April, 2024.

4 Respectfully submitted,

5 HOFLAND & TOMSHECK

6
7 /s/ Joshua Tomsheck
8 JOSHUA TOMSHECK, ESQ.
9 Counsel for Defendant **TERAN**
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ORDER

Based on the request of counsel, and lack of opposition from the prosecuting attorney,
and for good cause appearing, **IT IS ORDERED**, that Defendant, **NANCY TERAN'S**
sentencing proceeding, currently set for April 29, 2024, at 10:00 a.m., be continued to
June 4, 2024 at 8:15 a.m. in Courtroom 7C

Dated this 26th day of April, 2024.



UNITED STATES DISTRICT JUDGE